

IN THE UNITED STATES DISTRICT  
COURT FOR THE Middle DISTRICT  
OF TENNESSEE Nashville DIVISION

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OCT 25 2024

U.S. District Court

Middle District of TN

John Lawrence  
(NAME)

(List the names of all the plaintiffs filing  
this lawsuit. Do not use "et al." Attach  
Additional sheets if necessary.)

1267123  
(Prison Id. No.)

Prisoner of Tennessee Dept. of  
Corrections / Class  
(Name)

1267123  
(Prison Id. No.)

Plaintiff(s)

V.

Tennessee Dept. Of Correction  
(Name)

Commissioner Frank Strada  
(Name)

Defendant(s)

Civil Action No. \_\_\_\_\_  
(To be assigned by the Clerk's Office.  
Do not write in this space.)

JURY TRIAL REQUESTED  YES  NO

(List the names of all defendants  
against whom you are filing this  
Lawsuit. Do you see "et al." Attach  
Additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS FILED  
PURSUANT TO 42 U.S.C. § 1983

1. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: John Lawrence  
Prison I.D. of the first plaintiff: 1267123  
Address of the first plaintiff: PO Box 2000, Wartrace TN 37887

Status of Plaintiff: CONVICTED  PRETRIAL DETAINEE

2. Name of the second plaintiff: Prisoner of the Tennessee Dept. Of Corrections / Class  
Prison I.D. of the second plaintiff:  
Address of the second plaintiff: State of Tennessee

Status of Plaintiff: CONVICTED  PRETRIAL DETAINEE

(Include the name of the institution and mailing address with zip code for each plaintiff. If and plaintiff  
changes his or her address, he or she must notify the Court immediately. If there are more sheet of paper.)

B. Defendant(s) against whom this lawsuit is being brought: 1) Tennessee Dept. Of Corrections

2) Name of the first defendant: TDOC Commissioner Frank Strada

Place of employment of the first defendant: Tennessee Dept of Corrections

First defendant's address: 6<sup>th</sup> floor, Rachel Jackson Building, 320 6<sup>th</sup> Ave. N.  
Nashville TN 37203-

Named in official capacity?  Yes  No

Named in individual capacity?  Yes  No

3) Name of the second defendant: Warden Shawn Phillips

Place of employment of the second defendant: Morgan County Correctional complex

Second defendant's address: Morgan County Correctional complex  
PO Box 2000, Wartrace TN 37887

Named in official capacity?  Yes  No

Named in individual capacity?  Yes  No

(If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, his or her place of employment, address, and the capacity in which you are suing that defendant. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide each defendant's proper name, place of employment, and address, the Clerk will be unable to serve that defendant should process issue.)

## 2. JURISDICTION

A. Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 (applies to state prisoners).

Jurisdiction is also invoked pursuant to 28 U.S.C. § 1343(a)(3).

If you wish to assert jurisdiction under different or additional statutes, you may list them  
Below

## 3. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuit(s) in the  
United States District Court for the Middle District of Tennessee, or in any other federal or  
State court. Yes  No

B. If you checked the box marked "yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs John Lawrence

Defendants Coffee County Sheriff Dept.

2. In what court did you file the previous lawsuit? US District Court

3. What was the case number of the previous lawsuit? Do not have access to that record

4. What was the Judge's name to whom the case was assigned? Do not have access to that Record
5. What type of case was it (for example, habeas corpus or civil rights action)?  
Civil Rights
6. When did you file the previous lawsuit? (Provide the year, if you do not know the exact date.)  
2015
7. What was the result of the previous lawsuit? For example, was the case dismissed or appealed, or is it still pending?  
Dismissed on my Report, Private Resolution
8. When was the previous lawsuit decided by the court? (Provide the year, if you do not know the exact date.)  
NA

9. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit? Yes  No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

#### 4. EXAUSTION

- A. Are the facts of your lawsuit related to your present confinement?  Yes  No

- B. If you checked the box marked "No" in question 3.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain.
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- C. Do the facts of your lawsuit relate to your confinement in a Tennessee state prison?  
 Yes  NO

(If you checked the box marked "No," proceed to question 4.G IF you checked the box marked "Yes," proceed to question 4.D.)

- D. Have you presented these facts to the prison authorities through the state grievance procedure?  
 Yes  No

- E. If you checked the box marked "Yes" in question 3.D above:

What steps did you take? Filed multiple grievances on issues.

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What was the response of prison authorities? only one responded, "Non-Grievable"

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- F. If you checked the box marked "No" in question 4.d above, explain why not.
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- G. Do the facts of your lawsuit pertain to your confinement in a detention facility operated

I am a member of a class of prisoners within the Tennessee Department of Corrections (TDOC) known as Protective Custody. I am a member of this class of prisoners because I was involved in an altercation with members of a security threat group or street gang and received injuries. This was actually the 5<sup>th</sup> time I had been assaulted by this gang and one specific member in fact. This specific attack was carried out because of a previous riot in the District Court where I was repeatedly attacked in a county jail where these individuals and gang was housed. See: "John Lawrence vs. Coffee County Sheriff Dept. US Dist. Ct. 2015." After the attack the Administration of Morgan County Correctional Complex (MCC) deemed my life to be in danger after investigation of the incident and placed me onto a Security Designation custody level of equal status to Maximum custody level (though not because of dangerous or unmanageable behavior nor for punitive reasons but to secure my safety). Note: that Protective Custody is not a security status for punishment as that prior to the new directive by Commissioner Frank Strada which this action attacks, Protective Custody prisoners, as quoted in TDOC State Policy 506.16 "living conditions for segregated inmates", Protective custody prisoners enjoyed the same property allowance as that of general population.

I represent for the purpose of this action the class of Protective custody prisoners within the Tennessee Dept. of Corrections. Myself and the class of prisoners represented hold that, based on numerous years in TDOC Prisons, conversations with staff officers, Administration, etc. that TDOC has a severe security issue with abundance of Drugs/Contraband as well as huge underground economy and profit business in these items, controlled by security threat groups, and what would be understood to go with such a problem. It's gotten so bad that prisoners needing Protective Custody due to drug addictions threatening their lives worth their drug debts enforced by these

security threat groups. It's grown so severe statewide in every prison that there simply is not enough bedspace for Protective Housing. Being that Prisoners have a right to reasonable protection from harm TDOC cannot simply limit the Protective Custody population. So to stem this flow of huge drug debtied Protective Custody Prisoners, and deter them from seeking protective custody, Commissioner Frank Strada, Wardens of the TDOC Prisons, et al have established a Deterant being the Denial of Protective Custody Prisoners Order of Personal property packages. This includes shoes, clothing, Gramma articles, writing materials, TVs/Electronics, Religious Faith Group items, etc. with the complaint is included the catalog of items allowed to other Maximum Security Prisoners. Not that in the memo advising of this prohibition that the only Prisoners also subject to property order restriction other than Protective Custody Prisoners are those who are serving Punitive Disciplinary Offenses of which they are under punishment after Due Process conviction for behavior rule violation. It's nothing less than a punishment outside Disciplinary Due Process conviction for being a Protective Custody Prisoner. May/Be Not being of the drug debt vary the deterrent targets. The Protective Custody Prisoners are allowed to keep personal property items already in possession but are not allowed to order any future items.

The Protective Custody class complaint with the violation of our Civil rights is as follows. Overtly the scheme is discriminatory and cannot be denied as a punishment, a hardship outside normal prison liberties, rights, and privileges ordinarily enjoyed by prisoners. simply because we exercise our Right to be protected from harm. The Tennessee Dept. Of Corrections, The Commissioner Frank Strada, and collective Wardens of the TDOC facilities inflict a hardship upon our class of Protective Custody Prisoners in order to encourage Prisoners NOT to exercise their right to be free from harm. This is more a violation of Prisoners Constitutional rights. Also at MCEX and most other Prisons Protective Custody

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are housed in maximum security, solitary confinement, 23 ad 1 hour lockdown which is in itself a harsh mentally taxing environment. To add this deterrent condition denies prisoners things such as art materials, cold/hot weather clothing, TVs/Radios which break the strict solitary daily living conditions. Also, writing materials for personal mail ad legal mail correspondence outside quantity of paper/pens/envelopes supplied by facility is also severely restricted by this new deterrent. Religious faith items such as for myself as Islamic faith Observer I'm not allowed Prayer oils, Religious Headwear, nor Prayer mats/rugs; at same is true for members of other faiths items. This is an discriminatory restriction upon our practice of our faith outside those items allowed to be possessed/worn by all other classes of prisoners. This is only some of the violations noted but overall the practice violates prisoners 1<sup>st</sup>, 4<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup> Amendment rights of the Constitution of the United States.

On behalf of myself and all members of the class of Protections Custody Prisoners in the custody of the Tennessee Dept. of Corrections we pray Relief from said Practice and Rights Violations.

Pro sa-

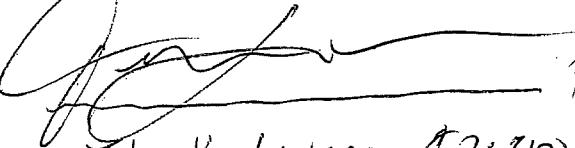
John R Lawrence # 267123

the Prisoners of the State of Tennessee Department Of Corrections are Currently Being Denied The Order OF Books /Printed Materials from Vendors or Organizations which include Religious Books and Legal Manuals/Books. This violates Prisoner Religious freedom and Access to the Courts for any Religions manuals/instruction not Provided By Chaplains which are extremely limited groups, and severely restricts Prisoners ability to litigate Criminal Cases and especially Civil in matters of Civil Rights violations, example Being My Facility Morgan County Correctional Complex has No Manuals /Books Recognized By the Bar, etc on CIVIL Litigation whether its all but impossible for Prisoners to Bring complaints before the Honorable United States District Court as of and currently, added by Because of my years inside Prison law libraries as a former legal Aid and Prior Experience Litigating a Complaint Before The Honorable Court.

This Problem Is vast and encompasses the entire TDOC Prison system State and Private Facilities. It serves no penological purpose that overweighs the Prisoners Constitutional Rights violated, is in the case of legal Restriction and access to the Courts Dangerous to Prisoner Health, Safety, and well-being, or in the case of Religious matters is morally and spiritually destructive sending Prisoners back to society potentially worse for the Prison experience due to moral & spiritual neglect.

The Problem effects not only myself But Every Prisoner in the state of Tennessee Department Of Corrections therefore is a Class issue where this action should be certified as a Class Action and of scope myself as an unlicensed legal professional and pro se litigant is not capable of litigating in its Complexity as such nor legally just for me to do on behalf of the huge Prison Population effected, by Commissioner Frank Strads Book Ban, etc.

Wherefore myself as well as the class of TDOC Prisoners Represented do pray this Honorable Court Grant Relief from said Practice and Rights violations



Prose.

John R. Lawrence, #267123

Myself, Plaintiff John Lawrence, and the class of Prison of which I am a member, and represent in this action, "Protective Custody Prisoners" as defined in TDOC Policy "506.16" and "404.09" as those prisoners separated from general population for the purpose of providing safety for inmates requiring such, as well as the entire Adult Prison Population of the Tennessee Dept. of Corrections effected by the Religious and Legal Printed Book Ban, hold the following Rights Granted us by the Constitution of the United States are violated by the actions of the defendants:

Amendment I, Free Exercise of Religion

Amendment II, Right of Due Process

Amendment III, Unrestricted Access to the Civil Courts

Amendment VIII, Cruel and Unusual Punishment

We hold the practices or policies responsible are oppressive, discriminatory, and are done solely to create a hardship, cruel living conditions, impede judicial access, and discourage prisoners exercising the right to be safe from threats to their safety/wellbeing from dangers due to an enhanced cruel living condition than those enjoyed by all other classes of prisoners except punitive under disciplinary punishments.

We pray the Honorable Court Out Relief from said violations.

  
John Lawrence Pro se  
267123

By city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)  
\_\_\_\_Yes \_\_\_\_NO

H. If "Yes" to the question above, have you presented these facts to the authorities operating the detention facility? \_\_\_\_Yes \_\_\_\_No

I. If you checked the box marked "Yes" in question 3.H above:

1. What steps did you take? \_\_\_\_\_

2. What was the response of the authorities who run the detention facility? \_\_\_\_\_

If you checked the box marked "No" in question 4.H above, explain why not. \_\_\_\_\_

**5. CAUSE OF ACTION**

Briefly explain which of your constitutional rights were violated:

*See attached Pages*

**6. STATEMENT OF FACTS**

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim number each claim separately and set forth each claim in a separate paragraph sheets, if necessary. Use 8-½ inch x 11-inch paper. Write on one side only, and leave a 1-inch margin on all 4 sides.

*See attached Pages*

**7. RELIEF REQUESTED:** State exactly what you want the Court to order each defendant to do for you.

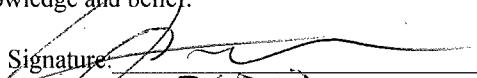
*Declaratory Judgment  
Compensatory Damages to cover cost of Action.*

*Nominal Damages as the Honorable court finds Proper and Just  
Punitive Damages as the Honorable Court finds Proper and Just  
Temporary Injunction and Restraining Orders to stop Violation until Verdict.*

I request a jury trial.  Yes  No

#### 8. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true the best of my (our) information, knowledge and belief.

Signature:  Date: 10-16-24

Prison Id. No. 267123

Address (Include the city, state and zip code.): P.O Box 2000  
Wartburg TN 37087-2000

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Prison Id. No. \_\_\_\_\_

Address (Include the city, state, and zip code.): \_\_\_\_\_

**ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT**, and provide the information requested above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

**ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS**, if not paying the civil filing fee.

**SUBMIT THE COMPLAINT AND (1) THE REQUIRED FILING FEE OR (2) COMPLETED APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES AND COSTS TOGETHER**. Complaints received without the required filing fee or application to proceed without prepayment of fees will be returned. Filing fees and applications to proceed without prepayment of fees submitted without a complaint will be returned.

John Lawrence #267123  
McC 26t-207  
PO Box 2000  
Warren TN 37887-2000



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OCT 25 2024

U.S. District Court

United States District Court  
Middle District of Tennessee  
Clerk of the Court  
801 Broadway, Rm A845  
Nashville TN 37203-3816

M.C.C.X.  
OCT 21 2024  
[Signature]

Legal Mail

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